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**IN THE COURT OF COMMON PLEAS YORK COUNTY, PENNSYLVANIA**

SARA PICKETT,	:	
Plaintiff	:	
v.	:	
	:	No. 2021-FC-001007-03
KRISTOFFER HEXTHER,	:	
Defendant	:	
v.	:	
BRUCE HEXTHER,	:	
Intervenor	:	

**PETITION FOR MODIFICATION OF A CUSTODY ORDER**

AND NOW, comes Petitioner/Intervenor, Bruce Hexter, by and through his counsel, Joshua Harshberger, Esquire, of Jacobson, Julius & Harshberger, and files the within Petition for Modification of a Custody Order, and in support thereof states the following:

1. Petitioner is Bruce Hexter (hereinafter "Grandfather"), an adult individual residing at 1472 Bramblewood Court, Pottstown, PA 19464.
2. Respondent is Sara Pickett (hereinafter "Mother"), an adult individual with a last known residential address of 278 Coventry at Waterford, York, PA 17402 with a mailing address of 2159 White Street, Suite 3, Box 142, York, PA 17404.
3. The parties are the natural parent and paternal grandfather of minor child R.H. (YOB 2015) and Mother is the natural parent of minor child A.P. (YOB 2013), who is covered in these custody proceedings.

4. By decision of the Court, Orders of Court dated April 7, 2022, June 2, 2022 and September 6, 2022 were entered granting Mother sole legal custody and primary physical custody with Grandfather having rights to legal information and partial physical custody of the minor children. A true and correct copy of the Orders are attached hereto as Exhibit "A" and incorporated herein.

5. It is in the best interest of the children that custody should be modified and grant Grandfather shared legal and shared physical custody for the following reasons:

- a. Mother currently resides with the children at an unknown address and is refusing to communicate with Grandfather;
- b. Mother has not been present at the exchange location the last three (3) Saturdays and is withholding the children from Grandfather during his custodial time;
- c. Mother does not answer any of Grandfather's phone calls or text messages and does not allow the children to communicate with Grandfather;
- d. Mother is intentionally alienating the children from Grandfather and speaks ill of the Grandfather in front of the children;
- e. Grandfather is willing and able to care for the children.

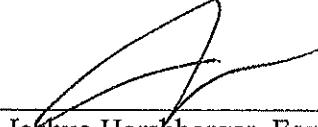
6. Petitioner has filed a completed Criminal Record/Abuse History Verification form required pursuant to Pa. R. C. P. No. 1915.3-2.

WHEREFORE, Petitioner requests that this Honorable Court modify the existing Orders to be in the best interest of the minor children and grant Petitioner shared legal and shared physical custody of the minor children.

Respectfully submitted,

JACOBSON, JULIUS & HARSHBERGER

Date: 6/27/23

By: 

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IN THE COURT OF COMMON PLEAS OF YORK COUNTY,  
PENNSYLVANIA

SARA PICKETT, Plaintiff : No. 2021-FC-001007-03

VS

KRISTOFFER HEXTTER,  
Defendant

VS

BRUCE HEXTTER,  
Intevenor

(Custody Trial)

63-2001-11847  
YORK COUNTY  
COURT CLERK'S OFFICE  
RECEIVED APR 11 2022

York, Pa., Thursday, April 7, 2022

Before the Honorable N. Christopher Menges, Judge

APPEARANCES:

Josh Bodene, Esquire  
For the Plaintiff

Joshua A. Harshberger, Esquire  
For the Defendant  
For the Intervenor

\* \* \*

TEMPORARY ORDER OF CUSTODY

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In this matter, this custody trial needs



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4 completed. Mother has to put on her case, and the  
5 Court has been advised that should take an hour to an  
6 hour-and-a-half.

7 Accordingly, the Court does schedule  
8 this to be finished on June 2, 2022, at 1:30 p.m. The  
9 Court has allowed one-and-a-half hours to finish this.  
10 Father and/or grandfather may participate by Zoom  
11 rather than live if they so prefer.

12 In the meantime the Court issues the  
13 following temporary order:

14 First of all, for both of these  
15 children, Riley and Aubrey, mother has sole legal and  
16 sole physical custody. However, for both children,  
17 mother will furnish to father all educational, medical,  
18 counseling, and all other records to father within  
19 48 hours of her receiving them by her putting them in  
20 the United States mail postage prepaid within 48 hours  
21 of her receiving them. Hopefully, father will receive  
22 them somewhat shortly thereafter.

23 The Court is cognizant that the United  
24 States mail takes a long time these days. But father  
25 doesn't seem to have any other way of receiving these

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4 things. So for now, mother will send them to father  
5 through the United States mail. When mother sends  
6 records to father, confidential information such as  
7 social security numbers may be redacted.

8 Mother may also choose to mail the  
9 documents to Attorney Harshberger who will then mail it  
10 to father through attorney records. I will leave that  
11 to the parties to work that out.

12 Additionally, father may have phone  
13 contact with Riley only for up to 30 minutes one time  
14 per week, and it can be by Zoom or other video. The  
15 times will be agreed to by the parties. Additionally,  
16 father may write letters to Riley through mother.

17 Father is to have no contact with Aubrey  
18 in any way at any time until further order of court.

19 Grandfather, also known as Pop Pop, will  
20 have partial physical custody of both children one time  
21 per month for ten hours. That will be on a Saturday  
22 from 9 a.m. until 7 p.m. The first Saturday will be  
23 this coming Saturday, April 9, 2022, and the second  
24 Saturday of each month thereafter.

25 Pop Pop, Mr. Bruce Hexter, will both

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4 pick up the children at mother's residence and deliver  
5 the children to mother's residence at the conclusion of  
6 the ten hour time period.

7                   Additionally, the grandfather, also  
8 known as Pop Pop, may have phone or video times with  
9 these two children as he may arrange with mother; but  
10 they should be at least three times per month.

11                  Finally, mother is ordered to contact a  
12 therapist of her choice and try to commence some  
13 therapy for Aubrey to at the very least deal with her  
14 issues relative to her biological father or  
15 psychological father, which she refers to as her  
16 brother's father, the interplay of that issue, as well  
17 as the fact that her brother's father, the  
18 psychological father, is currently incarcerated and  
19 will be for some time. Obviously, the therapist can  
20 address other issues as the therapist may deem  
21 appropriate.

22                  Both counsel will have access to any and  
23 all contact with or records by said therapist. This is  
24 a temporary order only until we finish this trial on  
25 June 2, 2022.

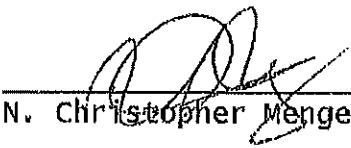
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4 Copies to Attorneys Harshberger and  
5 Bodene.

BY THE COURT:



N. Christopher Menges, Judge

sar  
4/8/2022  
No. 2021-FC-001007-03

IN THE COURT OF COMMON PLEAS OF YORK COUNTY,  
PENNSYLVANIA

SARA PICKETT

: No. 2021-FC-001007-03

VS

KRISTOFFER HEXTOR

&

BRUCE HEXTOR

(CUSTODY TRIAL)

RECEIVED  
YORK COUNTY PROTHONOTARY  
2022 JUN -3 PM 12:05  
JUDICIAL CENTER YORK PA

York, Pa., Thursday, June 2, 2022

Before the Honorable N. CHRISTOPHER MENGES, Judge

APPEARANCES:

JOSHUA A. SCOTT HARSHBERGER, Esquire  
For the Defendant and Intervenor

\* \* \*

O R D E R

14:49:12 22 In this matter the Court has taken  
14:49:13 23 testimony part of two days over a two or three month  
14:49:19 24 period. It is the final order in this matter as  
14:49:22 25 follows: The temporary order of April 7, 2022 in this

14:49:28 1 matter is confirmed in full except with a couple of  
 14:49:33 2 small changes. Those small changes are as follows:  
 14:49:41 3 Pop Pop, Bruce Hexter's Saturday times will be the  
 14:49:49 4 second and fourth Saturdays of each month. An  
 14:49:57 5 additional change is that the three times per month for  
 14:50:00 6 Pop Pop to have phone or video or equivalent will be  
 14:50:06 7 Monday at 6:00 p.m. on the first Monday of each month,  
 14:50:10 8 the third Monday of each month, and the fifth Monday of  
 14:50:15 9 each month if there is a fifth Monday.

14:50:18 10                   Mother, father, and Pop Pop,  
 14:50:22 11 grandfather, will have their communications through  
 14:50:25 12 OurFamilywizard. Grandfather, Bruce Hexter, will  
 14:50:30 13 within ten days of this order sign up and pay for the  
 14:50:34 14 annual fee for OurFamilywizard and provide the  
 14:50:38 15 information to father if he can do that through the  
 14:50:41 16 prison, if he can't, that's okay, and will provide the  
 14:50:44 17 log in information for mother who will promptly join  
 14:50:48 18 OurFamilywizard. All communications relative to these  
 14:50:54 19 children will be through OurFamilywizard.

14:50:59 20                   Additionally, mother will give to both  
 14:51:01 21 father and Pop Pop the portal communication, and if  
 14:51:05 22 necessary, the password so that they may go to the  
 14:51:09 23 school portal to receive information, records, and so  
 14:51:12 24 forth from the childrens school. Father may exercise  
 14:51:22 25 his time of talking with Riley only by calling Riley

14:51:35 1 when Riley is with Pop Pop. Father will continue to  
14:51:39 2 have no contact with Aubrey. Mother will cause an  
14:51:48 3 intake to have taken place for a therapist for Aubrey  
14:51:53 4 and/or the family by August 1, 2022.

14:52:05 5 Finally, we schedule a follow up hearing  
14:52:11 6 with a date and time to be set forth in just a moment  
14:52:14 7 as soon as we look at our calendars. The purpose of  
14:52:18 8 that follow up hearing will be to see how visits are  
14:52:22 9 going, how telephone contact is going, and to confirm  
14:52:25 10 that a initial intake with a therapist has taken place  
14:52:30 11 as ordered in this Court Order today. If either father  
14:52:36 12 or grandfather believe mother has not obeyed the Court  
14:52:41 13 order, either of their counsel may file a petition for  
14:52:47 14 contempt, and if the petition is so filed that contempt  
14:52:51 15 will be heard at that follow up hearing.

14:52:55 16 The Court wants to make it clear this is  
14:52:59 17 a follow up hearing only to ensure things are going  
14:53:01 18 well and that this order is a final order.  
14:53:05 19 Nevertheless, the Court does want to make it very clear  
14:53:10 20 to mother that if there is any more games playing by  
14:53:17 21 mother on telephone contact or visits, the Court may at  
14:53:23 22 the follow up hearing give either father and/or  
14:53:28 23 grandfather expanded rights.

14:53:30 24 The aforesaid follow up hearing will be  
14:54:01 25 on September 6, 2022 at 10:00 a.m. in Courtroom 6005.

14:54:08 1 Grandfather, his counsel, and mother will be in person.  
14:54:14 2 Father may be by Zoom. Any other witnesses may be by  
14:54:18 3 Zoom. If things are going well, a written stipulation  
14:54:27 4 from all parties would do in lieu of actual appearance,  
14:54:32 5 but if that does not happen, the follow up hearing will  
14:54:36 6 take place at the date and time aforesaid and everyone  
14:54:41 7 will be present as just indicated.

14:54:47 8 Copy to Attorney Harshberger. Copy to  
14:54:50 9 mother, Sara Pickett, at 278 Coventry at Waterford  
14:54:59 10 York, PA 17402.

14:55:03 11

BY THE COURT:



N. CHRISTOPHER MENGES, Judge

EMR  
6-2-2022

CHARGE OF PROTHONOTARY

2022 SEP -7 PM 2:04

IN THE COURT OF COMMON PLEAS OF YORK COUNTY,  
YORK, PA  
PENNSYLVANIA

SARA PICKETT : No. 2021-FC-001007-03  
VS :  
KRISTOFFER HEXTHER and :  
BRUCE HEXTHER :

(Custody Review Hearing)

York, Pa., Tuesday, September 6, 2022

Before the Honorable N. Christopher Menges, Judge

APPEARANCES:

JOSHUA A. SCOTT HARSHBERGER, Esquire  
For the Defendant

\* \* \*

O R D E R

21           In this matter the Court has held a  
22 review hearing. The result of that, the following is  
23 the Court's Order:

24           1. The Court Order of June 2, 2022, is

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3 ratified and confirmed.

4                   2. The Court Orders that mother will  
5 post all information relative to these children on the  
6 Our Family Wizard that the grandfather has set up.  
7 This includes, but is not limited to, all children's  
8 activities, school or otherwise, parent/teacher  
9 conferences, medical and dental and other appointments,  
10 incidents and things that happen.

11                  Said differently, mother will over  
12 communicate with grandfather about these children and  
13 what's going on with them.

14                  3. Mother will immediately provide user  
15 name and password so that grandfather can get on the  
16 school portal. That may include her address  
17 information and so forth, but that is not something  
18 that she can keep private.

19                  4. Mother will put on Our Family Wizard  
20 all information relative to the children's therapy or  
21 therapist and sessions and will immediately sign  
22 releases so that grandfather can talk to the therapist  
23 any time he wishes to do so.

24                  5. The phone calls between grandfather,  
25 also known as Pop-Pop, and these children will occur.

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3 They will occur with both children even if mother  
4 believes that one of the children does not want to talk  
5 to the grandfather. The children will talk to  
6 grandfather during phone calls as per the prior Order.

7 Finally, the Court schedules a second  
8 review hearing. The second review hearing will be  
9 December 13th, 2022, at 10:00 a.m. in courtroom 6005.  
10 The purpose of this review hearing will be:

11 1. The Court may give father and/or  
12 grandfather joint legal custody if it deems that in the  
13 best interest of these children.

14 Secondarily, the Court may or may not  
15 increase grandfather's physical custodial rights.

16 And finally, if father and/or  
17 grandfather files a petition for contempt, the hearing  
18 on December 13th may also be a contempt hearing.

19 The Court wants to make it very clear  
20 that mother's attitude towards grandfather and his  
21 getting information and records of these children has  
22 been deplorable. Mother needs to over communicate with  
23 grandfather by Our Family Wizard and other means.  
24 Grandfather needs to, if he can make it, go to the  
25 children's parent/teacher conferences and other

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3 activities of these children.

4 Mother has been cavalier about following  
5 the prior Orders of this Court, and the Court hereby  
6 admonishes mother and makes it very clear to her that  
7 this Court will not allow its Orders to be disobeyed  
8 and warns mother most severely that if this  
9 disobedience continues and a contempt petition is filed  
10 and she is found in contempt, the sanctions could be  
11 dire. As stated earlier, mother needs to over  
12 communicate with grandfather.

13 To make mother feel more secure about  
14 this over communication, grandfather is Ordered to not  
15 share with the father mother's personal information,  
16 including but not limited to her address and phone  
17 number.

18 Mother has continually challenged this  
19 Court's jurisdiction and its interpretation of the law,  
20 and, therefore, mother is told in open Court that she  
21 does have 30 days to appeal this matter to the Superior  
22 Court of Pennsylvania.

23 A copy to Attorney Harshberger for  
24 father and grandfather and a copy to mother, Sara  
25

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2 Picket, at 278 Coventry at Waterford, York, PA 17402.

BY THE COURT:



N. Christopher Menges, Judge

cmm

9-6-2022

Sara Pickett vs. Kristoffer Hexter and Bruce Hexter,  
Number 2021-FC-001007-03

**VERIFICATION**

I, Bruce Hexter, being duly authorized to make this verification, do hereby verify that the facts stated in the foregoing document are true and correct to the best of my knowledge, information, and belief. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S. §4904 relating to unsworn falsification to authorities.

Date: 6-27-2023

By:

  
Bruce Hexter

**CERTIFICATE OF COMPLIANCE**

I certify that this filing complies with the provisions of the Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts that require filing confidential information and documents differently than non-confidential information and documents.

Submitted by: Jacobson, Julius & Harshberger

Signature: 

Name: Joshua Harshberger

Attorney No.: 319814

Joshua Harshberger, Esquire  
Supreme Court ID: 319814  
Jacobson, Julius & Harshberger  
8150 Derry Street, Ste A  
Harrisburg, PA 17111  
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**IN THE COURT OF COMMON PLEAS YORK COUNTY, PENNSYLVANIA**

SARA PICKETT,  
Plaintiff

v.

No. 2021-FC-001007-03

KRISTOFFER HEXTTER,  
Defendant

v.

CUSTODY

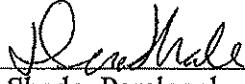
BRUCE HEXTTER,  
Intervenor

**CERTIFICATE OF SERVICE**

I, Dera Shade, Paralegal, do hereby certify that a copy of the **Petition for Modification of a Custody Order** was this day served upon the opposing party by first class mail at the address indicated below:

Sara Pickett  
2159 White Street, Suite 3  
Box 142  
York, PA 17404  
*Pro Se Respondent*

DATED: 6/27/2023

  
\_\_\_\_\_  
Dera Shade, Paralegal